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United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Sean O'Connor,

Defendant.

FILED	RECEIVED
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COUNSEL/PARTIES OF RECORD	
AUG 13 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY

CRIMINAL INFORMATION

2:19-cr-00179-JAD-NJK

VIOLATION:

*Conspiracy to Commit Mail Fraud,
18 U.S.C. § 1349*

1 **THE UNITED STATES ATTORNEY FOR THE DISTRICT OF NEVADA CHARGES**
2 **THAT:**

3 **INTRODUCTION**

4 At all times relevant to this Information, unless otherwise indicated:

- 5 1. The defendant SEAN O'CONNOR was a resident of Clark County, Nevada.
- 6 2. Beginning no later than 2011, and continuing until in or about February 2018,
- 7 within the District of Nevada and elsewhere, the defendant SEAN O'CONNOR conspired
- 8 with others to engage in a direct-mail scheme that sent fraudulent prize-promotion mailings
- 9 to thousands of consumers across the United States. The mailings induced victims to pay a
- 10 fee in exchange for a falsely-promised large cash prize. The object and purpose of the
- 11 scheme was to obtain money from victims by means of false and fraudulent statements and
- 12 material concealments of fact in the mailings. None of the victims who sent a fee to
- 13 O'CONNOR and his co-conspirators in response to a fraudulent prize-promotion mailing
- 14 from the direct-mail scheme ever received a large cash prize.

15 **COUNT ONE**

16 *Conspiracy to Commit Mail Fraud*

- 17 3. The allegations contained in paragraphs one and two are realleged and
- 18 incorporated as if fully set forth in this paragraph.
- 19 4. Beginning no later than 2011, and continuing until in or about February 2018,
- 20 within the District of Nevada and elsewhere,

21 **SEAN O'CONNOR,**

22 the defendant, together with others, whose identities are known to the United States, did

23 knowingly and intentionally conspire to devise a scheme to defraud victims and to obtain

24 money and property from victims by means of materially false and fraudulent

25 representations, and, for the purpose of executing such scheme, did place or cause to be

26 placed in any post office and authorized depository for mail matter any matter or thing,

27 namely fraudulent prize-promotion mailings, to be sent and delivered by the United States

28

1 Postal Service to victims across the United States, contrary to Title 18, United States Code,
2 Section 1341.

3 All in violation of Title 18, United States Code, Section 1349.

4 **FORFEITURE ALLEGATION**

5 1. The allegations contained in Count One are hereby realleged and
6 incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18,
7 United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section
8 2461(c).

9 2. Upon conviction of the felony offense charged in Count One of this Criminal
10 Information,

11 SEAN O'CONNOR

12 defendant herein shall forfeit to the United States of America any property, real or personal,
13 which constitutes or is derived from proceeds traceable to violations of Title 18, United
14 States Code, Section 1341, a specified unlawful activity as defined in Title 18, United States
15 Code, Sections 1956(c)(7)(A) and 1961(1)(B), or Title 18, United States Code, Section 1349,
16 conspiracy to commit such offense:

- 17 1. \$106,150;
- 18 2. \$20,400.32;
- 19 3. \$34,364;
- 20 4. \$40,010;
- 21 5. \$50,126.59;
- 22 6. \$4,998;
- 23 7. \$10,908;
- 24 8. \$15,278;
- 25 9. \$6,975;
- 26 10. \$4,644.;

1 11. \$3,101;

2 12. \$1,824;

3 13. \$13,146

4 14. \$1,785;

5 15. \$14,439;

6 16. \$9,887;

7 17. \$8,253;

8 18. \$138;

9 19. \$12,464.03;

10 20. \$18,950; and

11 an in personam criminal forfeiture money judgment including, but not limited to, at least
12 \$175,000.

13 (all of which constitutes property).

14 3. If any property being subject to forfeiture pursuant to Title 18, United States
15 Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), as a result of
16 any act or omission of the defendant:

17 a. cannot be located upon the exercise of due diligence;

18 b. has been transferred or sold to, or deposited with, a third party;

19 c. has been placed beyond the jurisdiction of the court;

20 d. has been substantially diminished in value; or

21 e. has been commingled with other property which cannot be divided without
22 difficulty;

23 it is the intent of the United States of America, pursuant to Title 21, United States Code,
24 Section 853(p), to seek forfeiture of any properties of the defendant for the property listed
25 above and the in personam criminal forfeiture money judgment including, but not limited
26 to, at least \$175,000.

1 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28,
2 United States Code, Section 2461(c); Title 18, United States Code, Section 1341; Title 18,
3 United States Code, Section 1349; and Title 21, United States Code, Section 853(p).

4 DATED: this __ day of July, 2019

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6 NICHOLAS A. TRUTANICH
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8
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14  8/13/19